

January 7, 2008

Dr. Jeff Hendrix, Superintendent
Marion Community Schools #2865
1240 South Adams Street
Marion, Indiana 46953

Dear Dr. Hendrix:

On November 19, 2007, the Indiana Department of Education's (IDOE) monitoring team commenced an on-site monitoring review of the Marion Community Schools' administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Marion Community Schools is responsible for taking appropriate action to remedy compliance deficiencies.** In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, Marion Community Schools must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

The IDOE team would like to thank you, Ginger Studebaker-Bolinger and other staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting Marion Community Schools to improve the delivery of Title I services.

Sincerely,

Lee Ann Kwiatkowski, Director
Division of Compensatory Education

cc: Dr. Ginger Studebaker-Bolinger, Title I Program Administrator
Marion Community Schools #2865

Linda Miller, Assistant Superintendent of Community Relations
and Special Populations, IDOE

**Indiana Department of Education
Title I, Part A Monitoring**

District: Marion Community Schools

Monitoring Date: November 19, 2007

Monitoring Team: Lee Ann Kwiatkowski, Hazel Beasley, Teresa Neely, Lenee' Reedus, Sarah Pies, and Brenda Martz

Part D Monitoring Team: Jamie Miller

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of the Marion Community Schools on November 19, 2007. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

| Monitoring Topic | Statutory Citation |
|---|--|
| 1) Compliance with professional qualification requirements for teachers and paraprofessionals | NCLB §1111(h)(6)(A) NCLB §1119(c)(1) NCLB §9101(23) |
| 2) Compliance with parental involvement requirements | NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(32) |
| 3) Compliance with professional development requirements | NCLB §1116(a)(1)(D) NCLB §9101(34) |
| 4) Compliance with school improvement requirements | NCLB §1116(b) NCLB §1116(c) NCLB §1116(e) |
| 5) Compliance with district improvement requirements | NCLB §1116(c) |
| 6) Compliance with schoolwide program requirements | NCLB §1114 |
| 7) Compliance with targeted assistance program requirements | NCLB §1115 |
| 8) Compliance with school ranking and serving requirements | NCLB §1113 |
| 9) Compliance with comparability requirement | NCLB §1120A |
| 10) Compliance with maintenance of effort requirement | NCLB §1120A NCLB §9521 |

| | |
|--|---|
| 11) Compliance with equitable services to private school students requirements | NCLB §1120 |
| 12) Compliance with statutory set-aside requirements | NCLB §1113 NCLB §1116 NCLB §1118 |
| 13) Compliance with supplement, not supplant requirements | NCLB §1120A |
| 14) Compliance with financial management systems requirements | EDGAR §80.20 EDGAR §80.36 |
| 15) Compliance with compensation for personnel services requirements | OMB Circular A-87, Attachment B, Section 8 |
| 16) Compliance with complaint procedures | Subpart F—Complaint Procedure (CFR, Title 34) |
| 17) Compliance with equipment requirements | EDGAR §80.32 OMB Circular A-87 |
| 18) Compliance with Neglected Institutions | NCLB §1401 |
| 19) Compliance with Delinquent Institutions | NCLB §1401 |

During the on-site visit, IDOE spent time interviewing staff from Marion Community Schools at their central office. In addition, IDOE visited Frances Slocum and Allen Elementary Schools where interviews were conducted with the principal.

IDOE also reviewed Marion Community Schools' documents, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic 1: Compliance with NCLB Professional Qualification Requirements for Teachers and Paraprofessionals

Background

IDOE interviewed the Title I Program Administrator, Grant Coordinator and building principals. In addition, IDOE reviewed letters to personnel, and notices to parents.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Principal Attestation: Marion Community Schools ensures that the principal of every school receiving Title I funds attests annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB. As part of the annual application review, grant approval is not given unless each principal has signed a template attesting that their school is in compliance with the professional qualification requirements of NCLB.

Professional qualification requirements: Marion Community Schools provided evidence demonstrating that teachers currently meet the highly qualified teacher requirements.

Recommendation: Marion Community Schools had teachers complete the High Objective Uniform State Standard of Evaluation (HOUSSE). However all staff reviewed at the time of the onsite had completed the HOUSSE on the old document. An updated document is now used by the IDOE. IDOE recommends that Marion Community Schools consider having staff complete the new document.

Information regarding Highly Qualified teachers and HOUSSE documentation can be found at the following website:

<http://www.doe.state.in.us/hqt/welcome.html>

Parents’ Right-to-Know regarding request for teacher qualifications: Marion Community Schools was able to demonstrate that the letter had been sent to all parents of students attending Title I schools informing the parents of their right to know about the qualifications of the students’ classroom teacher and where relevant, paraprofessionals.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1

Other Matters:

Direct Supervision: Marion Community Schools has hired literacy specialists that are retired teachers. At Allen Elementary these individuals are creating lesson plans and are not under direct supervision of a highly qualified teacher. These individuals are being paid out of the non-certified column. In order to continue this practice, Marion Community School needs to amend the grant and pay these literacy specialists out of the certified salary line. If Marion Community Schools continues to fund these individuals from the non-certified line, the district needs to assure that these individuals are under direct supervision and implementing lessons planned by a highly qualified teacher.

Required Action: In the response to monitoring, Marion Community Schools must provide information regarding the payment of the literacy specialists. The district must also provide assurance that non-certified staff will be under the direct supervision and implementing lessons planned by a highly qualified teacher.

Monitoring Topic 2: Compliance with Parental Involvement Requirements

Background

IDOE interviewed the Title I Program Administrator, Grant Coordinator and building principals. In addition, IDOE reviewed policies and agenda provided at the on-site.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Strength:

Building schools' and parents' capacity for strong parental involvement: Marion Community Schools showed evidence of building capacity with Title I parents. Each Title I school has a parent coordinator that works with parents to develop family night activities, and have worked to develop a parent resource room. During staff meetings, schools take time to discuss how they can better work with parents. Schools also give parents a parent friendly standards booklet to help parents understand what their children should be working on at school and at home.

Areas of Compliance

Annual meeting: Marion Community Schools showed evidence that all Title I schools held an annual meeting regarding information on Title I.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2

LEA Parent Involvement Policy: Marion Community Schools showed evidence of a district parental involvement policy, which did not include all statutory components. (Attachment A)

Required Action: Marion Community Schools must ensure that a district parental involvement policy is revised with parents and contains all statutory components. The LEA Parental Involvement Policy, along with sign-in sheets from staff and parents that developed this plan, must be submitted to the IDOE by February 22, 2008. The policy must thereafter be updated on an annual basis.

School Written Parental Involvement Policy and Compact: Marion Community Schools does not have School Parental Involvement Policies that contain all required components. Although schools have parental involvement policies, a thorough review of Francis Slocum and Allen Elementary Schools revealed that essential components are missing from both the policies and the compacts. The compacts from both schools were identical. (Attachments B, C and D)

Required Action: Marion Community Schools must submit School Parental Involvement Policies including compacts for Francis Slocum and Allen Elementary Schools to the IDOE. Evidence must be submitted to the IDOE by February 22, 2008 showing the policies were developed with meaningful consultation with parents. Evidence must also be submitted to the IDOE that shows the policies were distributed to all Title I parents. Marion Community Schools must ensure that the Parental Involvement Policies contain the necessary components as stated in Sec. 1118 in order to be in compliance with NCLB requirements. Parental Involvement Policies must be updated with parents annually. These policies should be specific to the individual school and reflect the unique activities occurring within the school.

Parent Information Resource Center (PIRC): Marion Community Schools did not provide evidence of PIRC information being sent home to parents at all Title I schools. Allen Elementary provided documentation; however, Frances Slocum was unable to produce this evidence.

Required Action: Marion Community Schools must provide parents with information about the Indiana Parent Information Resource Center at all Title I

schools. Marion Community Schools must submit evidence to the IDOE by February 22, 2008 that this information has been provided to parents.

Reviews Effectiveness of Parental Involvement Activities: Marion Community Schools could not provide evidence that there is ongoing review of the effectiveness of their parent involvement activities.

Required Action: Marion Community Schools must evaluate the effectiveness of the parental involvement activities for Title I parents. Marion Community Schools must send the IDOE a copy of the review of effectiveness for the 2007-2008 school year by May 5, 2008.

Monitoring Topic 3: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school choice and Supplemental Educational Services (SES).

Background

IDOE interviewed the Title I Program Administrator, Grant Coordinator and principals at Francis Slocum and Allen Elementary to discuss school improvement issues.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Areas of Compliance

Public School Choice Notice: Marion Community Schools provided evidence of mailing letters to parents informing them of the school's improvement status and the option to transfer to another school. The letter was translated and sent to parents of limited English students.

Peer Review of School Improvement Plans: Marion Community Schools did provide evidence of a peer review process for school improvement plans.

Implementation of school improvement plan: Marion Community Schools demonstrated that the district monitors the implementation of school improvement plans.

Implementation of Supplemental Educational Services (SES): Marion Community Schools provided evidence that SES was being implemented correctly. The SES coordinator had a detailed database to ensure that only eligible students were receiving SES. This database was used to verify attendance and invoicing.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3

Tracking of Choice Transfers: Marion Community Schools offers an open enrollment to all students. However, the district only pays for transportation for those students electing for a Choice related transfer. Currently the transportation department is compiling the transfer information and giving this information to the Title I department. Using the current transfer system, Marion Community Schools was unable to determine which students were electing Choice. Marion Community Schools had an OIG audit with this finding several years ago. This tracking system should have been developed and maintained.

Required Action: Marion Community Schools must develop a system to track whether a student is receiving a Choice transfer based on the school improvement status. This will allow Marion Community Schools to ensure that they are only paying for transportation for those students. Marion Community Schools must provide the IDOE a copy of the tracking system.

School Improvement Plan: Marion Community Schools did not provide evidence that schools being identified for improvement develop or revise a school improvement plan within three months of being identified for improvement, with all statutory components, in consultation with school staff, parents, and outside experts. (Attachments E and F)

Required Action: Marion Community Schools must revise and update current plans to include all 10 statutory components and cover a two year period. The district must also provide evidence that school staff and parents participated in the revision of the plan. Evidence of meetings (e.g., notices to parents, agendas, sign-in sheets), and the updated plan must be provided to IDOE February 22, 2008.

Monitoring Topic 4: Compliance with District Improvement Requirements

Background

Statutory Requirement: District (local educational agency) improvement requirements are contained in §1116(c).

Areas of Compliance

Marion Community Schools is not in LEA improvement.

Monitoring Topic 5: Compliance with Schoolwide Program Requirements

Background

IDOE interviewed the Title I Program Administrator, Grant Coordinator and building principals regarding schoolwide program requirements.

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school, federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 5

Evaluation of schoolwide program effectiveness: Marion Community Schools requires that plans are handed into the central office. The district monitors purchase orders and professional development. However, there was not evidence that the plans are evaluated to determine the effectiveness.

Required Action: Marion Community Schools must conduct an evaluation to show evidence that participating students are demonstrating academic growth. Marion Community Schools must use the data gathered from each program to determine their overall effectiveness with students who are failing or are most at-risk of failing.

Schoolwide Program Plans: Marion Community Schools were unable to ensure that all schoolwide program schools develop schoolwide plans that are compliant with all

statutory requirements. Schoolwide plans can be incorporated into existing PL 221 plans, as long as all the statutory components are included. (Attachment G)

Required Action: Marion Community Schools must ensure that all schoolwide program schools develop schoolwide plans that are compliant with all statutory requirements of Title I. Parents must be a part of the team that develops these plans. The schoolwide plan from Frances Slocum and Allen Elementary must be submitted to the IDOE by May 5, 2008. RMC Research Corporation will be working with Frances Slocum as part of the school support team. As a component of this team, support will be provided to develop a compliant schoolwide plan. IDOE is currently in discussions with RMC Research Corporation to determine additional technical assistance to remaining Title I schools.

Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements

Background

Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.

Areas of Compliance

Marion Community Schools does not have a Targeted Assistance Program

Monitoring Topic 7: Compliance with School Ranking and Serving Requirements

Background

IDOE interviewed the Title I Program Administrator regarding the Title I ranking and serving requirements.

Statutory Requirement: The ranking and serving requirements are contained in Section 1113.

Areas of Compliance

Ranking and serving: Marion Community Schools demonstrated compliance with the statutory requirements for ranking and serving.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7

None.

Monitoring Topic 8: Compliance with Comparability Requirement

Background

IDOE interviewed the Title I Program Administrator regarding the Title I comparability requirement.

Statutory Requirement: The comparability requirement is contained in Section 1120A.

Areas of Compliance

Comparability: Marion Community Schools met compliance with comparability requirements.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8

None.

Monitoring Topic 9: Compliance with Maintenance of Effort

Background

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.

Other Matters:

Marion Community Schools is not currently maintaining effort. It is determined that this is due to the bond buyout. IDOE will work with the district to help write a waiver to the United States Department of Education. (Attachment H)

Monitoring Topic 10: Compliance with Equitable Services to Private School Students Requirements

Background

Statutory Requirements: The equitable services requirements are contained in Section 1120.

Areas of Compliance

Consultation with Non-Public Officials: Marion Community Schools was able to provide written documentation of consultation between the district and non-public schools. Currently no schools within Marion Community Schools accept Title I funds. A nonpublic school was interviewed by phone and found that the district does contact them each year and explains the option of receiving these funds.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10

None.

Monitoring Topic 11: Compliance with Statutory Set-aside

Background

IDOE interviewed the Title I Program Administrator, Grant Coordinator and Corporation Treasurer regarding the Title I statutory set-aside requirements.

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

Areas of Compliance

Homeless students: Marion Community Schools did set aside money for homeless. The district relies on other resources and no money from Title I was expended last year.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11

1 Percent Parental Involvement: Marion Community Schools provided evidence that one percent of the allocation for parental involvement was reserved. However, there was \$12,966.12 that was not expended in parent involvement.

Required Action: Marion Community Schools must amend the current application to include these funds. The district is currently funding the parent involvement coordinators at the school level.

School Improvement: Marion Community Schools did not ensure that schools spend not less than 10% of their Title I funds to provide schools' teachers and principals high-quality professional development focused on sub-groups of concern.

Required Action: Marion Community Schools must amend the current application to reflect an additional \$22,456.45 at Frances Slocum that was not expended in professional development.

Monitoring Topic 12: Compliance with Supplement, not Supplant

Background

IDOE interviewed the Title I Program Administrator, Grant Coordinator and Corporation Treasurer regarding the Title I supplement, not supplant requirements.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Area of Compliance

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12

Supplement not Supplant: This is covered under Topic 18.

Monitoring Topic 13: Compliance with Financial Management Systems Requirements

Background

IDOE interviewed the Title I Program Administrator, Grant Coordinator and Corporation Treasurer regarding Marion Community Schools' financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance

Audit Findings: Marion Community Schools did not have any audit findings from Indiana State Board of Accounts.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13

Financial Management and Procurement: Marion Community Schools has a policy for the procurement of items. However, open purchase orders were found at Walden Books in which there was no evidence of district oversight. Expenditures were being rounded instead of recorded for the actual amount.

Required Action: Marion Community Schools must ensure that the process of an expense going from the budget page to ordering and procurement is followed for all expenditures. IDOE fiscal staff worked with the treasurer to resolve how expenditures were being rounded. The program administrator must sign off on all expenditures.

Reasonable, allocable, and necessary: This is covered under Topic 18.

Monitoring Topic 14 Compliance with compensation for personnel services requirements

Background

IDOE interviewed the Title I Program Administrator as well as the principals of two schools in regard to the compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Areas of Compliance:

Compensation for personnel services requirements: Marion Community Schools was able to demonstrate sufficient compliance with the requirements of OMB Circular A-87, Attachment B, Section 8.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14

None.

Monitoring Topic 15: Compliance with complaint procedures

Background

IDOE interviewed the Title I Program Administrator regarding the complaint process.

Areas of Compliance

Complaint Process: Marion Community Schools was able to demonstrate that the district has a complaint procedure. No complaints have been filed.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15

None.

Monitoring Topic 16: Compliance with equipment requirements – OMB A-87 and EDGAR 80.36

Background

IDOE interviewed the Title I Program Administrator, Corporation Treasurer and two school principals regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Areas of Compliance

Disposition of Equipment: Marion Community Schools showed evidence of a disposition policy.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16

Equipment and Technology Inventory: Marion Community Schools did not provide inventory lists that meet the requirements of EDGAR 80.32.

Required Action: Marion Community Schools must develop an inventory list to include all material purchased. In addition, the completed inventory list must be submitted to the IDOE by February 22, 2008.

Labeling of supplies: Marion Community Schools did not show evidence that equipment and supplies purchased with Title I funds was properly labeled and identified.

Required Action: Marion Community Schools must ensure that all nonexpendable supplies, equipment, and inventory must be properly labeled at both the schools and delinquent institution.

Monitoring Topic 17: Compliance with Neglected Institutions: Funded through Title I, Part A

Background

Definition of facility: A public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable State law, due to abandonment, neglect, or death of their parents or guardian.

Marion Community Schools does not have a neglected institution.

Monitoring Topic 18: Compliance with Delinquent Institutions: Funded through Title I, Part D, Subpart 2

Background

IDOE interviewed the Title I Program Administrator regarding a delinquent institution funded through Title I, Part D, Subpart 2. In addition IDOE visited the delinquent institution and interviewed staff.

Definition of facility: A public or private residential facility operated for the care of children who have been determined to be delinquent or in need of supervision. The purposes of Title I, Part D are to: (1) improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that they have the opportunity to meet the same challenging State academic content and State student achievement standards that all children in the State are expected to meet; (2) provide these children with services to enable them to transition successfully from institutionalization to further schooling or employment; and (3) prevent at-risk youth from dropping out of school as well as to provide dropouts and children and youth returning

from correctional facilities or institutions for neglected or delinquent children and youth, with a support system to ensure their continued education.

To receive Subpart 2 funds, each eligible LEA must apply to the SEA as outlined in section 1423 of ESEA. An LEA application must include (1) a description of the program(s) to be assisted with the Subpart 2 funds, and (2) a description of the formal agreements, regarding the program to be assisted, between the LEA and the local correctional facilities and alternative school programs that serve children and youth involved with the juvenile justice system.

The application also must include, as appropriate, a description of how participating schools will coordinate with locally operated correctional facilities working with delinquent children and youth that have entered into a formal agreement with the LEA to ensure that the children and youth in the local correctional facilities are participating in an education program that is comparable to the one the LEA operates in the school that such children and youth would otherwise attend. In determining if the education program in a correctional facility is comparable, the LEA may wish to use criteria that indicate, for example, whether the program meets State academic achievement standards, whether the program offers the subjects required for each grade level, and whether the subjects offered provide credits toward a high school diploma.

Areas of Compliance

Partnerships: Staff at the Grant County Juvenile Center have created partnerships with area colleges to facilitate the positive mentoring and successful transition of students.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 18

Reasonable, allocable, and necessary: A random sampling of expenditures revealed items that were not approved in the application were purchased for the Grant County Juvenile Center. These purchases included numerous DVDs, a DVD/VCR player, and a 27 inch television not approved in the budget, and not reasonable for the academic improvement or transitional skill development of students in the facility.

Required Action: Marion Community Schools must charge back a total of \$835.68 for items not approved in the grant application. Documentation of the chargeback must be submitted to the IDOE by February 22, 2008. All future purchases must first be approved in the Title I application, be obtained by Marion Community Schools, properly labeled, and then distributed to the Grant County Juvenile Center.

Labeling of supplies: Marion Community Schools did not show evidence that equipment and supplies purchased with Title I funds was properly labeled and identified at the Grant County Juvenile Center.

Required Action: Marion Community Schools must ensure that all nonexpendable supplies, equipment, and inventory must be properly labeled at the delinquent institution.

Other Pending Matters

IDOE has concerns regarding the program's supplemental nature and qualifications of staff in the Title I program at the Grant County Juvenile Center. This matter is pending further review by the Juvenile Justice Commission. IDOE will provide a response of compliance or non-compliance upon completion of this additional review.

Attachment A

Local Educational Agency (LEA) Parental Involvement Policy: Sec. 1118 (a) (2) Each LEA shall develop jointly with, agree on with, and distribute to, parents of participating children a written parent involvement policy. The policy shall describe how the agency will:

| Parental Involvement Policy Requirements: | Found on Page # |
|--|---|
| 1. Involve parents in the joint development of the plan and the process of school review and improvement | Yes |
| 2. Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance | Yes |
| 3. Build the schools' and parents' capacity for strong parental involvement by <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate to foster parental involvement <input type="checkbox"/> Coordination and integrating parental involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool and other programs and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Other reasonable support for parental involvement activities under section 1118 as parents may request | 1. No 2. No 3. Yes 4. No 5. No 6. No |
| 4. Coordinate and integrate parental involvement strategies under Title I with strategies under other programs such as Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs | Yes |
| 5. Conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background) and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies | Yes |
| 6. Involve parents in the activities of the schools served under Title I | Yes |

Attachment B

School Parent Involvement Policy Checklist

School Parental Involvement Policy: Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

| Requirements of School Parental Involvement Policy Allen | Found on Page # |
|--|------------------------------|
| 1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved | Yes |
| 2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement | No |
| 3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy | No |
| 4. Provide parents with: <ul style="list-style-type: none"> <input type="checkbox"/> Provide timely information about Title I programs <input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet <input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible | No |
| 5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA | No |
| 6. Includes a School-Parent Compact (see checklist next page) | Yes |
| 7. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement <input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request | More details on all bullets. |

Attachment C

School Parent Involvement Policy Checklist

School Parental Involvement Policy: Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

| Requirements of School Parental Involvement Policy Frances Slocum | Found on Page # |
|--|-----------------------------|
| 7. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved | No |
| 8. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement | No |
| 9. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy | No |
| 10. Provide parents with: <ul style="list-style-type: none"> <input type="checkbox"/> Provide timely information about Title I programs <input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet <input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible | No |
| 11. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA | No |
| 12. Includes a School-Parent Compact (see checklist next page) | Yes |
| 8. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement <input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request | More details on all bullets |

Attachment D

School – Parent Compact Checklist

School-Parent Compacts: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

| School-Parent Compact shall include: Same compact | Found on Page # |
|--|---|
| <p>1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and</p> | <p>No-highlighted topics missing</p> |
| <p>2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement <input type="checkbox"/> Frequent reports to parents on their children's progress <input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities | <p>No-highlighted topics missing</p> <p>2. Yes</p> <p>3. No</p> |

Attachment E

School Improvement Plan: According to Sec. 1116 (b) (3) (A) after identification as a school in improvement, each school identified as in improvement shall, not later than 3 months after being so identified, develop or revise a school plan in consultation with parents, school staff, the LEA, and outside experts, for approval by such LEA. The school plan shall cover a 2-year period and include:

| Ten Components of School Improvement Plan | Compliant |
|---|---|
| 1. Strategies based on scientifically based research strategies to strengthen core academic subjects that addresses the specific academic issues that caused the school to be identified for school improvement | Yes |
| 2. Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the ISTEP+ | Yes |
| 3. Assurance that the school will spend not less than 10% each year to provide high quality professional development that: <ul style="list-style-type: none"> <input type="checkbox"/> Directly address the academic achievement problem that caused the school to be identified <input type="checkbox"/> Meets NCLB's professional development requirements <input type="checkbox"/> Provides increased opportunity for participating in professional development | No Include pd pages and budget from application |
| 4. Specifies how professional development funds will be used to remove the school from improvement status | Yes |
| 5. Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014) | No not to 2013-2014 |
| 6. Documentation that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school in a language parents can understand. | No Include letter |
| 7. Specifies the responsibilities of the school, the LEA, and the SEA including technical assistance to be provided | No – LEA and SEA |
| 8. Strategies to promote effective parental involvement in the school | Yes |
| 9. Activities before and after school, during summer, and during any extension of the school year | No |
| 10. Incorporates a teacher-mentoring program (in addition to any the LEA might offer for new teachers) | No |

Attachment F

School Improvement Plan: According to Sec. 1116 (b) (3) (A) after identification as a school in improvement, each school identified as in improvement shall, not later than 3 months after being so identified, develop or revise a school plan in consultation with parents, school staff, the LEA, and outside experts, for approval by such LEA. The school plan shall cover a 2-year period and include:

| Ten Components of School Improvement Plan | Allen | Compliant |
|---|-------|---|
| 1. Strategies based on scientifically based research strategies to strengthen core academic subjects that addresses the specific academic issues that caused the school to be identified for school improvement | | Yes |
| 2. Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the ISTEP+ | | Yes |
| 3. Assurance that the school will spend not less than 10% each year to provide high quality professional development that: <ul style="list-style-type: none"> <input type="checkbox"/> Directly address the academic achievement problem that caused the school to be identified <input type="checkbox"/> Meets NCLB's professional development requirements <input type="checkbox"/> Provides increased opportunity for participating in professional development | | No Include pd pages and budget from application |
| 4. Specifies how professional development funds will be used to remove the school from improvement status | | Yes |
| 5. Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014) | | No- only in reading, not to 2013-2014 |
| 6. Documentation that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school in a language parents can understand. | | No Include letter |
| 7. Specifies the responsibilities of the school, the LEA, and the SEA including technical assistance to be provided | | No- LEA and SEA |
| 8. Strategies to promote effective parental involvement in the school | | Yes |
| 9. Activities before and after school, during summer, and during any extension of the school year | | Yes |
| 10. Incorporates a teacher-mentoring program (in addition to any the LEA might offer for new teachers) | | No |

Attachment G

Title I Schoolwide Plan Checklist

Schoolwide Plan: Section 1114 (b) (2) Any school that operates a schoolwide program shall first develop (or amend a plan for such a program that was in existence on the day before the date of enactment of the NCLB Act of 2001), in consultation with the LEA and its school support team or other technical assistance provider under section 1117, a comprehensive plan for reforming the total instructional program in the school that:

- i. Describes how the school will implement the components described below
- ii. Describes how the school will use resources under this part and other sources to implement the components
- iii. Includes a list of SEA programs and other federal programs that will be consolidated in the schoolwide program
- iv. Describes how the school will provide individual student academic assessment results in a language the parents can understand, including an interpretation of those results, to the parents of a child who participates in the academic assessments required by the SEA plan.

| Components of a Schoolwide Plan*: Both Schools | Found on Page #: |
|---|-------------------------------------|
| 1. A comprehensive needs assessment of the whole school | No |
| 2. Implementation of schoolwide reform strategies that: <ul style="list-style-type: none"> <input type="checkbox"/> Provide opportunities for all children to meet proficient and advanced levels of student academic achievement <input type="checkbox"/> Use effective methods and instructional strategies that are based on scientifically based research that: <ul style="list-style-type: none"> <input type="checkbox"/> Strengthens the core academic program <input type="checkbox"/> Increases the amount of learning time <input type="checkbox"/> Includes strategies for serving underserved populations <input type="checkbox"/> Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards <input type="checkbox"/> Address how the school will determine if those needs of the children have been met <input type="checkbox"/> Are consistent with and are designed to implement state and local improvement plans, if any | No- Not enough specific information |
| 3. Highly qualified teachers in all core content area classes | No |
| 4. High quality and on-going professional development for teachers, principals, and paraprofessionals | Yes |
| 5. Strategies to attract high-quality, highly qualified teachers to this school | No |
| 6. Strategies to increase parental involvement, such as literary services | Yes |
| 6 a. Description how the school will provide individual academic assessment results to parents | Yes |
| 6 b. Strategies to involve parents in the planning, review, and improvement of the schoolwide plan | No |
| 7. Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program | No |
| 8. Opportunities and expectations for teachers to be included in the decision making related to the use of academic assessment results leading to the improvement of student achievement | No |
| 9. Activities and programs at the school level to ensure that students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance | No |
| 10. Coordination and integration of federal, state and local funds; and resources such as in-kind services and program components | No |
| 10 a. A list of programs that will be consolidated under the schoolwide plan (if applicable) | No |

Attachment H

MAINTENANCE OF EFFORT (MOE)

DEFINITION AND PURPOSE

Maintenance of Effort is required by many grant programs, including Title I. The purpose of the maintenance of effort requirement is to ensure the recipient of federal funds (district) does not spend those funds in place of state and local dollars. Maintenance of effort ensures grant recipients spend their state and local funds for the same activities that would be provided if federal dollars were not available. This results in a program where federal dollars supplement (add) the normal activities of the district and do not supplant (replace) the district's normal activities. The underlying principle is that the district is responsible for maintaining effort in providing a free public education to all students from year to year. Title I is in addition to the required education that all students receive.

CALCULATING MAINTENANCE OF EFFORT

The State Education Agency is responsible for calculating maintenance of effort as follows:

- The combined fiscal effort per student OR the aggregate expenditures of the district from state and local funds for free public education for the preceding fiscal year cannot be less than 90 percent of the combined fiscal effort OR aggregate expenditures for the second preceding fiscal year.
- The measure most favorable to the district is used to calculate the maintenance of effort requirement.
- If a district fails to meet the MOE requirement, the State Education Agency must reduce the district's Title I allocation in the exact proportion by which the district has failed to meet MOE. (Example: If a district's maintenance of effort is found to be only 80%, the Title I allocation is reduced by 10% because the MOE requirement is not less than 90%).

EXCEPTIONS

The U.S. Secretary of Education may waive the maintenance of effort requirement if it is determined that such a waiver would be warranted due to:

1. Exceptional or uncontrollable circumstances such as a natural disaster;
2. A precipitous decline in the financial resources of the district.